

# EXHIBIT G

# EXHIBIT C



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**Tivoli v. Prince, LT-320098-24/KI**

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From Kailyn Gaines <kgaines@lsnyc.org>

Date Tue 2/25/2025 2:39 PM

To nonpayments@cullenpc.com <nonpayments@cullenpc.com>

Bcc 24-2064547@lsnyc.legalserver.org <24-2064547@lsnyc.legalserver.org>

Mr. Cullen,

I am writing on behalf of my client, Lisa Prince. I see that you have started a nonpayment case against her-- LT-320098-24/KI. In this case, you claim that my client owes Tivoli BI LLC \$5,483.00 for rental arrears for the months of September 2023 through and including May 2024.

I plan to file a notice of appearance and a motion to dismiss the case, but I wanted to first reach out to you to provide you with an opportunity to withdraw the case voluntarily.

Ms. Prince does not owe any rental arrears. She has paid the Section 8 share of the rent for each of the months alleged. To the best of our knowledge, Tivoli has been inappropriately applying her rental payments towards a balance of at least \$190,115.86 which it alleges that she owes in use and occupancy. No court has ever awarded Tivoli a use & occupancy judgment in this—or any—amount. You and your client are violating federal debt collection laws by seeking to collect on a debt which Ms. Prince clearly does not owe via this nonpayment suit.

Please advise if you will withdraw this case as a result of the above. If not, I will shortly file a motion to dismiss and seek sanctions against your client and your firm.

Best,  
Kailyn Gaines

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